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Counsel for Petitioners

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

In re Application of

Oasis Focus Fund LP and Quadre Investments,
L.P.,

Petitioners, for an Order Pursuant to 28 U.S.C.
§ 1782 to Conduct Discovery for Use in a Foreign
Proceeding.

Case No. 23-mc-80020

JOINT STATUS REPORT

1 In accordance with the Court's Order of August 9, 2023 (ECF No. 33), the parties in the
2 above-captioned matter submit the following Joint Status Report.

3 Respondent has begun document production and anticipates making further rolling
4 productions in the coming weeks. The parties reserve their rights to further negotiate search terms
5 pending the results of these efforts. Respondent will provide a privilege log in connection with
6 these productions. The parties have also begun preliminary discussions around deposition
7 scheduling. There are no disputes regarding these matters at this time.

8 The parties have worked amicably with 507 Summit LLC, which has brought its own
9 Section 1782 application against Respondent, *507 Summit LLC v. David Katsujin Chao*, Case No.
10 4:23-mc-80069, which arises from the same Cayman Islands appraisal proceeding as the above-
11 captioned petition. The parties have not changed their positions on the issue of the allocation of
12 deposition time between Petitioners and 507 Summit LLC, discussed at greater length in the
13 parties' April 24, 2023 Joint Status Report (ECF No. 18). The parties continue to reserve their
14 rights.

15 Counsel for the parties are available by telephone or videoconference should the Court
16 have any questions.

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1 Dated: October 6, 2023

2 Respectfully submitted,

3 /s/ Linda H. Martin

4 /s/ Frank Busch

5 **FRESHFIELDS BRUCKHAUS
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15 *Counsel for Respondent David
Katsujin Chao*

16 *Counsel for Petitioners*

ATTESTATION RE SIGNATURES

I, Frank Busch, am the ECF User whose ID and password are being used to file this PETITIONER OASIS FOCUS FUND LP'S RULE 7.1 DISCLOSURE STATEMENT. I hereby attest that concurrence in the filing of this document has been obtained from its signatories.

/s/ Frank Busch

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